REMARKS

Claims 1, 5-8, 12-14, 17-18 and 21-28 are pending in this application. Claims 1, 5-6, 18, 21, 24-25 and 28 (which are subject to restriction and have been withdrawn by the Examiner) are cancelled, and new claims 29-32 are added herein. Accordingly, claims 7-8, 12-14, 17, 22-23, 26-27 and 29-32 are pending in this application.

Claims 7, 14 and 29 are independent.

Claims 29-32 recite the disclosed invention in a somewhat different manner.

Claims 7, 8, 12, 13, 14, 17, 22, 23, 26 and 27 stand rejected under 35 USC §112, second paragraph, as indefinite. The rejection is respectfully traversed.

The Examiner contends that it is unclear what the difference is between the received "instruction, from a first of the plurality of user stations representing a first of the payers, to make payment of a first bill to a first of the payees" and the transmitted "directive to transfer funds to a first of the deposit accounts associated with the first payee in accordance with the received instruction to pay the first bill" as recited in claim 7.

The Examiner also contends that it is unclear what the difference is between the received "transmitted instructions" (which are defined within the claim to be instructions to make payments of bills and to be transmitted by the first plurality of network stations, representing a first plurality of users) and the generated "directives to transfer funds to a plurality of different deposit accounts based upon the received instructions" as recited in claim 14.

The asserted basis for the rejection is not understood. The language of claims 7 and 14 is unambiguous as to the difference between the instruction(s) and the directive(s). The express language within these claims also makes clear that the recital of instruction(s) and directive(s) is not redundant.

It may be helpful for the Examiner to review, for example, the present application disclosure beginning on page 10, line 16. It is perhaps also worthwhile to note that a directive to transfer funds, does not inherently include payment of a bill, as is well understood in the art.

Claims 7, 8, 12, 13, 14, 17, 22, 23, 26 and 27 stand rejected under 35 USC

§102(e) as anticipated by, and under 35 USC §103(a) as obvious over Chang et al. (U.S. Patent No. 5,884,288). Claims 26 and 27 stand further rejected under 35 USC §103(a) as obvious over Chang et al. in view of Examiner's Official Notice of electronic check endorsement. The rejections are respectfully traversed.

Independent claim 7 requires, *inter alia*, that (1) a central database be configured to store the remittance information generated by a processor (which is also required by the claim to transmits a directive to transfer funds to a first of the deposit accounts associated with a first payee in accordance with a received instruction to pay a first bill from a first user station representing a first payer), and (2) the processor be configured to receive a request to access the remittance information from a payee user station, to retrieve the remittance information from the central database based upon the received access request, and to transmit the retrieved remittance information to the payee user station.

Independent claim 14 requires, *inter alia*, (1) a plurality of second network stations configured to transmit requests, via the communications network, to access remittance information, which is associated with the payment of the bills and which has been generated and stored by a central network station (the claim also requires that th central network station also generate directives to transfer funds to a plurality of different deposit accounts based upon received instructions to make payments of bills transmitted by a first plurality of network stations, representing a first plurality of users), and (2) that the central network station be configured to receive the transmitted requests, to access and retrieve the stored remittance information in response to the received requests, and to transmit, via the communications network, the retrieved remittance information to the plurality of network stations.

As discussed in prior responses, Chang is directed to an electronic billing and payment system utilizing electronic money. According to the Chang reference, a biller (payee) delivers an electronic bill to a payer's bank where it is stored in an electronic mailbox associated with the payer (see, for example, column 4, lines 37-43, and column 6, lines 57-60). The payer accesses the electronic bill and transmits a payment authorization to the payer bank to pay the bill (see, for example, column 7, lines 1-4).

The payer bank then generates and transmits to the payee an electronic check payable to the payee (see, for example, column 7, lines 25-30). The electronic check includes limited remittance information (see column 7, lines 48-56). The payee then electronically deposits the electronic check in a bank associated with the payee (see, for example, column 8, lines 36-38). The payee bank receiving the deposit then clears and settles the electronic check (see, for example, column 8, lines 21-25). Thus, the Chang technique is analogous to conventional payment by paper check, with the exception that the check is prepared by the payer's bank upon instruction of the payer and is electronic instead of paper.

The electronic check of Chang is not a directive to transfer funds from a payment account to a deposit account, as required by each of independent claims 7 and 14. Rather, as in conventional bill payment scenarios utilizing paper checks, the electronic check is a financial instrument, albeit electronic, must be presented by a payee to its bank. As expressly disclosed by Chang, an electronic check must be cleared and settled by a payee bank, as would any conventional paper check. Therefore, the electronic check of Chang does not direct a transfer of funds to a deposit account. Instead, the payee must tell its bank where to deposit funds from the check.

Furthermore, Chang neither teaches nor suggests the central database that stores remittance information so as to be accessible to a payee via a user station, and the processor which transmits a directive to transfer funds to a first deposit account associated with a payee in accordance with a received instruction to pay a bill from a first user station representing a payer and which, after generating the remittance information stored in the central database, receives a request to access the remittance information from the payee user station, and retrieves and transmits the stored remittance information based upon the received access request, as required by independent claim 1; or second network stations, representing multiple second users (e.g. payees), that can request access, via a communications network, to remittance information, which is associated with payment of the bills and has been generated and stored by a central network station (that also generates directives to transfer funds to different deposit accounts based upon received instructions to make payments of bills

transmitted by a first network stations, representing first users, e.g. payers), and a central network station which, after generating and storing the remittance information, retrieves the stored remittance information in response to the transmitted requests to access the remittance information, and transmits the retrieved remittance information to the second network stations representing the multiple second users e.g. payees), via the communications network, as required by independent claim 14.

Since, in Chang, payment remittance information is included in the electronic check transmitted to the payee, Chang lacks any need for and hence any disclosure of such features.

Regarding the Examiner's reliance on Figure 8B, as disclosed by Chang in column 8, lines 56-57, the depicted Web page is generated by the bank server 228 (not payee) for access by the payor (not payee).

Contrary to the Examiner's contention, there is nothing in Chang to suggest that the payee 208 transmits a request to access remittance information stored by the bank. In fact Chang explicitly discloses that the remittance information is pushed to the payee and thus there is no need for such a request to pull remittance information.

The capability of one of Chang's payees to access its own database of information is irrelevant. This is because independent claims 1 and 14 require a processor or central station which both (1) transmits a directive to transfer funds to a deposit account in accordance with a received instruction to pay a bill from a user or payer and, (2) after generating and storing the remittance information, receives a request to access the remittance information from another user or payee, and retrieves and transmits the stored remittance information based upon the received access request.

Accordingly, it is respectfully submitted that independent claims 7 and 14, and their dependencies, patentably distinguish over the applied art.

The claim 7 and 14 dependencies also further and independently distinguish over the applied prior art. For example:

Regarding claim 8, Chang discloses generation of an electronic check by a payer's financial institute (e.g., a bank) and transmission of the generated electronic

check to the payee. Chang does not disclose transmission of a directive (to transfer funds from a payment account to a deposit account) to a payer bank or other financial institute. Thus, in Chang, an electronic check is transmitted by a payer bank to a payee, while claim 8 requires transmission to a payer bank of a directive to transfer funds from a payment account.

Claim 12 requires that the central database be further configured to store the billing information so as to be accessible to another user station representing the another different payer. That is, according to claim 12 the central database must store remittance information relating to payments of a first payer of bills from a first payee, as well as billing information relating to bills from a second payee for a second payer, with the remittance information accessible by the first payee and the billing information accessible by the second payer.

Claim 13 requires that processor, which accesses the remittance information at the request of the first payee, also be able to access the billing information at the request of the second payer, and additionally to transmit the accessed remittance information to the first payee and the accessed billing information to the second payer.

Regarding claim 17, Chang does not teach stored remittance information, let alone remittance information having different information segments, each segment associated with payment of bills to a different one of a plurality of users, and storage of the remittance information so as to accessible to a particular one of a plurality of network stations associated with a particular user.

With regard to claims 26 and 27, the relevance the Examiner places in the assertion that directives to transfer funds could be batched, is entirely unclear. Claim 26 requires that the processor be further configured to transmit the directive after the receipt of the request to access the remittance information. Claim 27 requires that the central network station be further configured to generate each of the directives to transfer the funds in payment of a particular one of the bills to which that directive relates, only after the receipt of the request to access the remittance information associated with the payment of that particular bill. One can only ask what in Chang would suggest "directives ... may not have been generated until after the payee

requests remittance information" as asserted by the Examiner.

Claims 29-32 patentably distinguish over the applied prior art for reasons which should be apparent from the above discussion.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 01-2135 and please credit any excess fees to such deposit account.

Respectfully submitted,
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